

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

In Re: INNOVATIO IP VENTURES, LLC, PATENT LITIGATION	Consolidated Case No. 11 C 9308 (MDL 2303)
INNOVATIO IP VENTURES, LLC, Plaintiff, v. JW MARRIOTT CHICAGO, <i>et al.</i> ; Defendants.	Individual Case No. 11 C 6478 Honorable Judge James F. Holderman JURY TRIAL DEMANDED

AGREED MOTION FOR AN EXTENSION OF TIME

Plaintiff Innovatio IP Ventures LLC respectfully moves this Court to extend the deadline for the Defendants¹ to respond to the Complaint filed in this matter until March 26, 2012. The grounds for this motion are that Defendant has requested, and Plaintiff has agreed to allow, additional time for Defendants to allow counsel to investigate the claims asserted against each Defendant, including potential indemnity by a third party, so that each Defendant may prepare an appropriate response.

¹ For the purposes of this Motion, the Defendants are defined as the following: Chicago Marriott Downtown Magnificent Mile; Chicago Marriott Oak Brook; Chicago Marriott O'Hare; Chicago Marriott Suites Downers Grove; Chicago Marriott Suites O'Hare (Rosemont); Courtyard Chicago Arlington Heights/North; Courtyard Chicago Arlington Heights/South; Courtyard Chicago Deerfield; Courtyard Chicago Downtown/River North; Courtyard Chicago Elgin/West Dundee; Courtyard Chicago Highland Park/Northbrook; Courtyard Chicago Lincolnshire; Courtyard Chicago Naperville; Courtyard Chicago Oakbrook Terrace; Courtyard Chicago O'Hare (Des Plaines); Courtyard Chicago Waukegan/Gurnee; Hickory Ridge Marriott Conference Hotel; JW Marriot Chicago; Lincolnshire Marriott Resort; Oak Brook Hills Marriott Resort; Renaissance Chicago Downtown Hotel; Renaissance Schaumburg Convention Center Hotel; Residence Inn Chicago Deerfield; Residence Inn Chicago Downtown/Magnificent Mile; Residence Inn Chicago Lombard; Residence Inn Chicago Waukegan/Gurnee; SpringHill Suites Chicago (Lincolnshire); and Towneplace Suites Chicago Elgin/West Dundee.

Dated: March 2, 2012

Respectfully submitted,

/s/ Gabriel I. Opatken

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INNOVATIO IP VENTURES, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 2, 2012 the foregoing

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was filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record in Consolidated Case No. 11 C 9308 (MDL 2303) in accordance with Local Rule 5.9.

The foregoing was also served on the following representative for Defendants via electronic communication.

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